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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
AND THE CALIFORNIA ENERGY COMMISSION**

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Order Instituting Rulemaking to Implement  
the Commission's Procurement Incentive  
Framework and to Examine the Integration of  
Greenhouse Gas Emissions Standards into  
Procurement Policies.

Rulemaking 06-04-009  
(Filed April 13, 2006)

Energy Commission Docket 07-OIIP-01

**REPLY COMMENTS OF PACIFICORP (U 901 E) ON TYPE AND  
POINT OF REGULATION ISSUES**

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Date: December 17, 2007

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AND THE CALIFORNIA ENERGY COMMISSION**

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Pursuant to the *Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues* dated November 9, 2007, and the *Administrative Law Judges' Ruling Extending Comment Deadlines and Addressing Procedural Matters* dated November 30, 2007, PacifiCorp respectfully submits these reply comments addressing issues related to the type and point of regulation to be used to reduce greenhouse gas ("GHG") emissions in the electricity sector. PacifiCorp appreciates the opportunity to provide further comments in this proceeding on these important issues.

**I. DISCUSSION**

PacifiCorp has reviewed parties' December 3, 2007 comments on the type and point of regulation to be used to reduce GHG emissions in the electricity sector.

**A. Source-Based Point of Regulation**

After reviewing the conflicting comments submitted by the various parties, and assuming California moves forward with a California-only cap-and-trade program regulating GHG emissions from the electricity sector, PacifiCorp now recommends that California should

first implement a source-based cap-and-trade regulation and subsequently develop possible modifications to the program to address emissions associated with imported power. Assembly Bill 32 (“AB32”) provides the California Air Resources Board (“CARB”) with the necessary flexibility and discretion regarding the design of particular emissions reduction measures, strategies and programs needed to meet the overall AB32 statewide emissions limit. CARB’s new mandatory GHG reporting rule will require reporting of emissions attributable to imported power by those actually bringing it into the state. This information will allow for a more robust discussion on the pros and cons of the various possible changes to the point of regulation necessary to address GHG emissions attributable to imported power.

As other parties observed, in the short-term, a delay in addressing imported power does not necessarily increase overall western GHG emissions. In-state electricity prices will likely rise as in-state generators internalize carbon emissions in their running bids. Imports may also increase as out-of-state entities take advantage of the higher price while avoiding the corresponding carbon compliance cost. However, for the Western Electricity Coordinating Council (“WECC”), the marginal, price-setting generators are natural gas-fueled combined cycle power plants. California’s program is also unlikely to affect the dispatch of existing out-of-state coal plants since these units have much lower running costs, compared to natural gas combined-cycle units, and will continue to run at high capacity factors regardless of any GHG emissions reduction program California imposes.

A federal or regional GHG program is inevitable, and, as such, the threat of increased imports to California is significantly reduced even if California has adopted an in-state only source-based cap. Coupled with California’s promulgation of Senate Bill 1368 (“SB1368”), Washington’s Engrossed Substitute Senate Bill 6001 (“ESSB6001”), and the announcement of the Western Climate Initiative<sup>1</sup>, any incentive to build new coal-fueled generation in the interior

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<sup>1</sup> Western Climate Initiative membership continues to grow and now includes Arizona, California, Montana, New Mexico, Oregon, and Washington. See, <http://www.westernclimateinitiative.org/>.

west to serve California's retail load is greatly diminished.<sup>2</sup> PacifiCorp believes that new coal generating resources are no longer viable options for serving loads in the 2012 – 2014 timeframe, primarily due to the uncertainty regarding the costs of complying with expected federal climate legislation and the failure of the federal government to appropriate funds for development of lower emission coal technologies.<sup>3</sup>

It is also reasonable to assume that as soon as a federal or regional program is established, any shift in generation between states will be the result of internalizing carbon costs, which, PacifiCorp agrees with other parties, is a desirable outcome. In the short-term, California should promulgate a source-based cap-and-trade program and for the long-term, should work with other western states, via the Western Climate Initiative, to develop a regional source-based GHG cap-and-trade program, or work on the passage of a national source-based GHG cap-and-trade law.

## B. Existing Utility Programs

Related to the current discussion on the type and point of regulation, PacifiCorp requests that the Commission and the California Energy Commission ("CEC") investigate whether it is feasible to adopt a broad climate policy that allows a utility to pursue a portfolio strategy with carbon-equivalent savings as the unifying principle. Such a critical policy is impacted by the decision on the type and point of regulation. California should investigate whether modifying its existing utility regulatory policies and/or programs is beneficial and consider promulgating such changes without delay to allow utilities to begin accomplishing (and quantifying) GHG emissions reductions in the most cost-effective manner with existing technologies. As PacifiCorp has previously suggested, federal and state mandates relating to renewable and alternative energy development, vehicle fleet requirements, energy efficiency and

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<sup>2</sup> PacifiCorp recently communicated a similar conclusion regarding its own resource planning in a motion filed before the Utah Public Service Commission See, <http://www.psc.utah.gov/elec/05docs/0503547/55486NoticeWithdrawal.doc>

<sup>3</sup> *Id.*

demand-side management have traditionally been developed in isolation, without consideration of GHG impacts, and without consideration of the cost of alternatives. These mandates fail to capture useful data on climate impacts and/or benefits and have the potential to result in unintended consequences. This regulatory flexibility will be necessary to achieve the most cost-effective GHG reductions required by any cap-and-trade rule ultimately promulgated by the CARB.

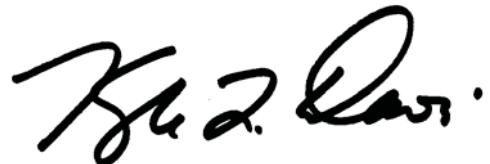
## **II. CONCLUSION**

PacifiCorp appreciates the opportunity to provide reply comments addressing issues related to the type and point of regulation to be used to reduce GHG emissions in the electricity sector. For all the foregoing reasons, PacifiCorp recommends that the Joint Staff pursue a source-based approach in the short-term and, in the alternative, consider developing a load-based regulation exclusively for small or multi-jurisdictional utilities and their unique circumstances. PacifiCorp also requests that once the choice of type and point of regulation is settled, the Commission and the CEC consider opening an investigation into whether it is feasible to adopt a broad climate policy that allows a utility to pursue a portfolio strategy with carbon-equivalent savings as the unifying principle.

Dated: December 17, 2007

Respectfully submitted,

By

A handwritten signature in black ink, appearing to read "Kyle L. Davis".

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**CERTIFICATE OF SERVICE**

I, Melinda LaJaunie, certify that I have on this 17<sup>th</sup> day of December 2007 caused a copy of the foregoing

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REGULATION ISSUES**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 17<sup>th</sup> day of December 2007 at San Francisco, California.

/s/ *Melinda LaJaunie*  
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